

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

STEPHEN M. FRIEDBERG
4204 Tamarack Lane
Murrysville, PA 15668

Plaintiff

v.

MUTUAL HOLDINGS LTD.
Barclays International Building
44 Church Street
P.O. Box HM 2064
Hamilton HM HX, Bermuda

and

IPC MUTUAL HOLDINGS LTD.
Barclays International Building
44 Church Street
P.O. Box HM 2064
Hamilton HM HX, Bermuda

and

MUTUAL HOLDINGS (BERMUDA) LTD.
Barclays International Building
44 Church Street
P.O. Box HM 2064
Hamilton HM HX, Bermuda

and

MUTUAL INDEMNITY LTD.
44 Church Street, Hamilton HM 12
P.O. Box HM 2064
Hamilton HM HX, Bermuda

and

MUTUAL INDEMNITY (BERMUDA) LTD
44 Church Street
P.O. Box HM 2064
Hamilton HM HX, Bermuda

and

MORGAN STANLEY
1585 Broadway
New York, New York 10036

Defendants

Case No. 02-CV-3193

**MOTION FOR ADMISSION PRO HAC VICE OF
VINCENT J. CONNELLY AND LISA A. DUNSKY**

Defendants, Mutual Holdings Ltd., IPC Mutual Holdings Ltd., Mutual Holdings (Bermuda) Ltd., Mutual Indemnity Ltd. and Mutual Indemnity (Bermuda) Ltd. (“Defendants”), in the matter presently before this Honorable Court, by and through its attorneys, Reed Smith, LLP, respectfully move for the admission pro hac vice of Vincent J. Connelly and Lisa A. Dunskey, and in support thereof aver as follows:

1. Mr. Connelly is a partner in the law firm of Mayer, Brown, Rowe & Maw in Chicago, Illinois. He is a member in good standing of the Bar of the State of Illinois, having been admitted thereto in 1975. His Illinois attorney identification number is 0501557. He is also a member in good standing in the U.S. District Court for the Northern District of Illinois and the U.S. Court of Appeals for the Seventh Circuit. Mr. Connelly has never been disciplined or censured by any court before which he has appeared.

2. Ms. Dunskey is an associate in the law firm of Mayer, Brown, Rowe & Maw in Chicago, Illinois. She is a member in good standing of the Bar of the State of Illinois, having been admitted thereto in 1993. Her Illinois attorney identification number is 6215999. She is also a member in good standing in the U.S. District Court for the Northern District of Illinois and the U.S. District Court for the Northern District of Indiana. Ms. Dunskey has never been disciplined or censured by any court before which she has appeared.

3. Good cause exists for the admission of Mr. Connelly and Ms. Dunskey herein because Defendants have requested that they represent them in the above-captioned matter.

4. This application for admission is made on the motion of John E. Quinn of Reed Smith, LLP, associate counsel to Defendants and a member in good standing of the Bar of

this Court, upon whom all pleadings, motions, notices and other papers may be served in conformance with Local Rule 83.5.2.

5. Margaret Manolakis, Esquire, counsel for Morgan Stanley, as well as Theodore Haussman, Jr., Esquire, Plaintiff's counsel, have represented to Mr. Quinn that they do not oppose this Motion.

WHEREFORE, for all of the foregoing reasons, Defendants respectfully requests that this Court admit Vincent J. Connelly and Lisa A. Dunsky to represent them pro hac vice.

Respectfully submitted,

John E. Quinn
Identification No. 19312
REED SMITH, LLP
2500 One Liberty Place
1650 Market Street
Philadelphia, PA 19103

Attorney for Defendants,
Mutual Holdings Ltd., IPC Mutual Holdings Ltd.,
Mutual Holdings (Bermuda) Ltd.,
Mutual Indemnity Ltd. and Mutual Indemnity
(Bermuda) Ltd.

Dated: June 6, 2002

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies he served a copy of the foregoing Motion For Admission Pro Hac Vice of Vincent J. Connelly and Lisa A. Dunskey upon the following counsel of record via United States, first class mail, postage prepaid, this 6th day of June, 2002:

Theodore Haussman, Jr., Esquire
Schnader Harrison Segal & Lewis LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103
Attorney for Plaintiff

Margaret Manolakis, Esquire
Stradley Ronon Stevens & Young, LLP
2600 One Commerce Square
Philadelphia, PA 19103
Attorney for Defendant
Morgan Stanley

John E. Quinn